

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, an Individual,

Plaintiff,

v.

THE WEINSTEIN COMPANY, LLC, THE
WEINSTEIN COMPANY HOLDINGS LLC,
HARVEY WEINSTEIN, LANCE MAEROV,
RICHARD KOENIGSBERG, TARAK BEN
AMMAR, DIRK ZIFF, TIM SARNOFF, MARC
LASRY, PAUL TUDOR JONES, JEFF SACKMAN,
AND JAMES DOLAN.

Defendants.
----- X

Civil Case No.:18-cv-05414 (RA)

DECLARATION OF DOUGLAS H. WIGDOR

I, Douglas H. Wigdor, hereby declare as follows:

1. I am a Partner at the law firm Wigdor LLP, attorneys for Plaintiff Jane Doe in the above-captioned matter. I have personal knowledge of the facts set forth herein and submit this declaration in connection with Plaintiff's opposition to Defendant Harvey Weinstein's Motion to Stay.

2. The criminal charges brought against Weinstein by the New York District Attorneys' Office do not concern the conduct that Mr. Weinstein is alleged to have committed against Plaintiff.

3. There are no known active criminal investigations concerning the conduct that Mr. Weinstein is alleged to have committed against Plaintiff.

4. Plaintiff has had no communications with the New York City Police Department or New York District Attorneys' Office concerning the charges pending against Mr. Weinstein.

5. On December 7, 2018, I emailed counsel for Harvey Weinstein inquiring whether emails between Mr. Weinstein and Plaintiff were produced in connection with the bankruptcy proceeding. I have not received a substantive response to my email.

6. Attached hereto as **Exhibit A** is a true and accurate copy of the case information sheet in Jane Doe v. The Weinstein Company LLC, Case No. BC68341, CA. Superior Court.

7. Attached hereto as **Exhibit B** is a true and accurate copy of Harvey Weinstein's Answer to the Amended Complaint filed on February 27, 2018.

8. Attached hereto as **Exhibit C** is a true and accurate copy of the Harvey Weinstein's Motion for Entry of an Order Compelling Limited Discovery Under Rule 2004 of the Federal Rules of Bankruptcy Procedure (the "2004 Motion") filed on April 20, 2018.

9. Attached hereto as **Exhibit D** is a true and accurate copy of the So-Ordered Protocol for the 2004 Motion ("2004 Order") filed on June 5, 2018.

10. Attached hereto as **Exhibit E** is a true and accurate copy of Harvey Weinstein's Emergency Motion to Use Emails Produced Under the 2004 Order filed on December 6, 2018.

11. Attached hereto as **Exhibit F** is a true and accurate copy of The Washington Post article dated May 25, 2018, and titled *Harvey Weinstein charged with rape and other abuse violations in sexual assault cases*.


12. Attached hereto as **Exhibit G** is a true and accurate copy of Harvey Weinstein's motion to stay in Canosa v. The Weinstein Company, No. 18-CV-4115 (S.D.N.Y.) (PAE), Dkt Nos. 123-26 (exhibits omitted).

13. Attached hereto as **Exhibit H** is a true and accurate copy of the docket report for Huett v. The Weinstein Company LLC et al., 18-cv-0612(SVW)(MRW).

14. Attached hereto as **Exhibit I** is a true and accurate copy of the eFiled Document Detail for Rehal v. Harvey Weinstein et al., Index No. 151738/2018 (N.Y. Sup. Ct.).

15. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: December 12, 2018
New York, New York



Douglas H. Wigdor